

To: Terry, Sara[Terry.Sara@epa.gov]; Davis, Matthew[Davis.Matthew@epa.gov]
Cc: Ashley, Jackie[Ashley.Jackie@epa.gov]; Lubetsky, Jonathan[Lubetsky.Jonathan@epa.gov]; Jay, Michael[Jay.Michael@epa.gov]
From: Sanders, LaTonya
Sent: Wed 3/2/2016 9:28:19 PM
Subject: RE: Request for phone call w/ Sen. McCaskill's staff on SO2 NAAQS proposed designation (Franklin County, MO)

Looping in Michael Jay.

From: Terry, Sara
Sent: Wednesday, March 02, 2016 3:09 PM
To: Davis, Matthew <Davis.Matthew@epa.gov>
Cc: Sanders, LaTonya <Sanders.Latonya@epa.gov>; Ashley, Jackie <Ashley.Jackie@epa.gov>; Lubetsky, Jonathan <Lubetsky.Jonathan@epa.gov>
Subject: RE: Request for phone call w/ Sen. McCaskill's staff on SO2 NAAQS proposed designation (Franklin County, MO)

Matthew,

We'd like Scott Mathias and James Hemby on the call for us, in addition to cc'ing Jackie and I (one of us will sit in.) From Region 7, please include Michael Jay, or whomever from the air division is point on this, but the Region needs to be in on the call. Also, please cc Rhea Jones. Might be worth arranging a pre call in advance of the conversation with the staffer.

Thanks,

Sara

From: Davis, Matthew
Sent: Wednesday, March 02, 2016 2:57 PM
To: Terry, Sara <Terry.Sara@epa.gov>; Mills, Kathy <Mills.Kathy@epa.gov>
Cc: Sanders, LaTonya <Sanders.Latonya@epa.gov>
Subject: Request for phone call w/ Sen. McCaskill's staff on SO2 NAAQS proposed designation (Franklin County, MO)

Sara, Kathy,

I hope you're doing well on this blustery day. Today, we got a request from Sen. McCaskill's DC office for a phone call to discuss the SO₂ designation for Franklin County, MO. I believe the public comment period is currently open on EPA's proposed decision to classify Franklin County as non-attainment, as opposed to following the state proposed designation as unclassifiable. The staffer would like to hear about EPA's reasoning around the designation and why we relied on modeling instead of the (new?) air monitors in the area to make the designation. I believe the state looked to the monitors in making their unclassifiable recommendation.

He'd be interested in having a call late this week or early next week. Let me know who you think would be best to have on the line and I can coordinate with them about the timing.

Thanks,

Matthew

Some background that the staffer has perhaps seen or been pointed to by constituent groups:

<http://news.stlpublicradio.org/post/preliminary-epa-designation-says-labadie-coal-plant-exceeds-federal-pollution-standard>

https://www3.epa.gov/airquality/sulfurdioxide/designations/round2/07_MO_resp.pdf

<http://news.stlpublicradio.org/post/missouri-regulators-unable-say-whether-air-near-amerens-labadie-power-plant-safe-breathe>

Summary excerpt from the MO submission to EPA on 9/24/2015:

Ameren Labadie Energy Center

For the area surrounding the Ameren Labadie Energy Center, the Air Program recommends an

unclassifiable area designation. Our recommendation is based on varying modeling results

showing both violations and no violations of the SO₂ standard around Labadie, depending on the

options and inputs chosen. In addition to these modeling evaluations of Labadie, preliminary data

from new ambient SO₂ monitors near the plant is available. Since the start of operation in April

2015, these monitors have been measuring SO₂ concentrations below the 1-hour SO₂ standard of

75 ppb. A new state statute, Section 643.650, RSMo, (SB 445 and HB 92 from the 2015 legislative

session), became effective August 28, 2015. Section 643.650, RSMo, directs the department to

consider SO₂ monitoring data for sources that choose to monitor to characterize their air quality.

Though the dataset from Labadie's new SO₂ monitors is limited, we must consider it, consistent

with state law. Because it cannot be determined based on available information whether the area is

or is not meeting the 1-hour SO₂ standard, the Air Program recommends an unclassifiable

designation for the area near Labadie. In addition to the Air Program's modeling evaluation and

review of available SO₂ monitoring data, we are including modeling analyses from Ameren

Missouri and Washington University Environmental Law Clinic that we received during the public

comment period as further support for the unclassifiable designation around Labadie. These

analyses are in Appendix G.

Matthew H. Davis

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